

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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EASYTEX CORPORATION LIMITED,

Plaintiff,

-against-

PETER & FRANK OF NY, CORP., CHUL KYU KIM  
a/k/a KIM CHUL KYU a/k/a CHUK CHUL KIM a/k/a  
ROBERT CHUL KIM a/k/a CHUL KYOO KIM a/k/a  
CHULKYOO KIM a/k/a KIM K. CHUL, BARO  
SHIPPING CO., LTD., TOP TEN TRANS, INC.,  
GFA, INC., 3 WIN INC., MERCURY, AMERICAN  
INTERNATIONAL LINE, INC., SOON CHAN HONG  
a/k/a SOON C. HONG a/k/a SOONCHAN C. HONG  
a/k/a SOON CHAN HONG a/k/a CHAN S. HONG a/k/a  
HONG S. CHAN a/k/a HONG SOON CHANG d/b/a  
SOONCHAN HONG CUSTOM HOUSE BROKER,  
STOP & STOR, NEXXON TRADING, INC., SOLUTION  
USA, INC., GAVIN FASHION, INC., KOREA EXPRESS  
USA, JKM USA, CORP., WESTY STORAGE  
CENTERS, jointly and severally,

Defendants.

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Defendant, Korea Express U.S.A., Inc., sued herein as Korea Express USA, answering the  
Cross-Claims of defendant American International Lines, Inc., sued herein under its trade name  
Mercury (hereinafter "American"), by and through its attorneys, the Law Offices of John C. Lane,  
alleges upon information and belief as follows:

1. This answering defendant denies each and every allegation set forth in paragraphs 181  
and 182, of defendant American's Cross-Claims asserted in American's Answer to Plaintiff's First  
Amended Complaint.

**WHEREFORE**, defendant, Korea Express U.S.A., Inc., sued herein as Korea Express USA,  
demands judgment dismissing the Cross-Claims of defendant American in their entirety, together  
with costs and disbursements, and such other and further relief as this Court deems just and proper.

DEFENDANTS DEMAND  
TRIAL BY JURY

Civil Action No.  
07-CV-3907 (BSJ)(JCF)

**ANSWER TO  
AMERICAN  
INTERNATIONAL  
LINES, INC. d/b/a  
MERCURY'S  
CROSS-CLAIMS**

Dated: New York, New York  
August 15, 2008

Yours, etc.

LAW OFFICES OF JOHN C. LANE



PETER C. BOBCHIN (PB 6076)  
Attorneys for Defendant, Korea Express U.S.A., Inc.,  
sued herein as Korea Express USA  
191 Godwin Avenue  
Wyckoff, New Jersey 07481  
201-848-6000  
**Our File No. TM.1921**

TO: Hyun Suk Choi, Esq. (HC 4208)  
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Attorneys for Plaintiff, Easytex Corporation Limited  
23 South Warren Street, 2nd Floor  
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609-396-2800

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202-973-2980

Carl E. Person, Esq. (CP 7637)  
Attorneys for Defendant, American International Lines, Inc., sued herein  
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212-307-4444

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Attorneys for Defendant, Soon Chan Hong  
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**CONTINUED ON NEXT PAGE**

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Jeffrey S. Stephens, Esq. (JS 9212)  
Jeffrey S. Stephens, P.C.  
Attorney for Defendant, Hicksville Project, LLC,  
sued herein as Westy Storage Centers  
14 Duncan Drive  
Greenwich, CT 06831  
203-531-5800

**CERTIFICATE OF SERVICE**

I certify that under penalty of perjury pursuant to 28 U.S.C. §1746 that on August 15, 2008, I caused to be served upon the following, by First Class United States Mail, postage prepaid, a true copy of defendant, Korea Express U.S.A., Inc.'s Answer to the Cross-Claims asserted by American International Lines, Inc., sued herein under its trade name Mercury, by depositing same in a U.S. Postal Box within the State of New Jersey, addressed to the following:

TO: Hyun Suk Choi, Esq. (HC4208)  
The Park Law Group, LLC  
Attorneys for Plaintiff, Easytex Corporation Limited  
23 South Warren Street, 2nd Floor  
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**COURTESY COPIES TO:**

Honorable Barbara S. Jones, U.S.D.J.  
United States District Court  
Southern District of New York  
U.S. Courthouse, Room 620  
500 Pearl Street  
New York, New York 10007

Honorable James C. Francis, IV, U.S.M.J.  
United States District Court  
Southern District of New York  
U.S. Courthouse, Room 1960  
500 Pearl Street  
New York, New York 10007

Dated: New York, New York  
August 15, 2008

  
PETER C. BOBCHIN (PB 6076)

*Easytex Corporation Limited v. Peter & Frank of NY, et al.*  
S.D.N.Y., Case No. 07-CV-3907 (BSJ)(JCF)  
Our File: TM.1921